

# EXHIBIT F

to Plaintiff's  
Motion for Sanctions



INSTRUCTION NO. \_\_\_\_\_

The Plaintiff, Mr. Leonard, contends that Defendant St. Charles County destroyed certain evidence stored in an electronic format. The Court has found that such destruction was intentional, and destruction occurred after the Defendant knew of its duty to preserve such evidence. You must presume this information would have been unfavorable to the Defendant.

*Stevenson v. Union Pac. R.R.*, 354 F.3d 739 (8<sup>th</sup> Cir. 2004).

*Process Controls Int'l. Inc. v. Emerson Process Mgmt.*, No. 4:10-CV-645, 2011 WL 5006220 (E.D. Mo. Oct. 20, 2011).

*Taylor v. Null*, No. 4:17-CV-0231-SPM, 2019 WL 4673426 (E.D. Mo. Sept. 25, 2019).

*See also*, Instruction 1.20, Seventh Circuit Civil Jury Instructions.